

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

JIM MOCK, *et al.*

Plaintiffs,

v.

CHANDELEUR HOMES, INC., *et al.*

Defendants.

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Case Number:

STATE OF MICHIGAN

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OAKLAND COUNTY

A F F I D A V I T

Before me the undersigned authority, in and for said state and county, personally appeared, David N. Goltz, who being by me first duly sworn, under oath, deposes and says:

1. My name is David N. Goltz and I am over the age of 19 years. I am employed as Associate General Counsel of Champion Enterprises, Inc. (hereinafter referred to as "Champion") and I have personal knowledge of the facts set forth in this Affidavit. I make this Affidavit and appear specifically for the purpose of supporting the motion filed in the above styled action and without waiving jurisdiction. I do hereby certify that as Associate General Counsel of Champion, I have access to its files and records relating to corporate structure, business operations and wholly owned subsidiaries. I have carefully examined said files and the documents contained therein. Said files and the documents contained therein are kept in the ordinary course of Champion's business, prepared by a person with knowledge of or made from information transmitted by a person with knowledge of the acts and events appearing in them, and made at or near the time of the acts and events appearing in them.

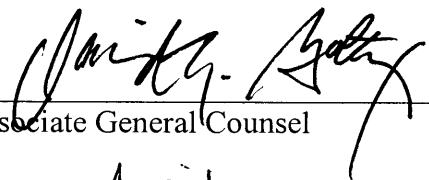
2. Champion is a Michigan corporation with its corporate headquarters and principal place of business in Auburn Hills, Michigan. Decisions relating to the business operations of Champion are made in Auburn Hills, Michigan.

3. Champion itself does not conduct or transact business in the state of Alabama. Champion is not registered or licensed to do business in Alabama. Champion has no employees or offices in Alabama. Champion has never maintained an office in Montgomery, Alabama.

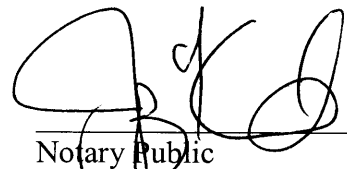
I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
TRUE AND CORRECT.

Executed this 28TH day of APRIL, 2006 in Auburn Hills, Michigan.

CHAMPION ENTERPRISES, INC.

By: 
Its Associate General Counsel

Sworn and subscribed before me this 28th day of April,
2006.


Notary Public
My Commission Expires: 7/29/11

